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July 27, 2016

File No.
33219.281

VIA FOIA ONLINE:

United States Environmental Protection Agency

Re: *Litigation related to Bronx Legionnaires' Disease Outbreak*

Dear Sir/Madam:

We represent one of the defendants in litigation related to an outbreak of Legionnaires' Disease in Bronx, New York. We respectfully request, pursuant to the Freedom of Information Law of the State of New York (Public Officers Law, Section 84, et seq.), that you furnish this office with the following:

All materials related to the investigation of any equipment, buildings, sites, and/or locations in Bronx County, New York, in connection with any/all Legionnaires' Disease outbreak(s), from January 1, 2014 to the present, including, but not limited to, all documents, records, correspondence, testing, sampling data, epidemiological data, research, laboratory results, reports, complaints, studies, photographs, memoranda, notices, warnings, fines, violations, citations, abatements of any cited conditions, inspection records, safety logs, inspections logs and reports, and witness statements including, but not limited to, all of the aforementioned materials related to the following:

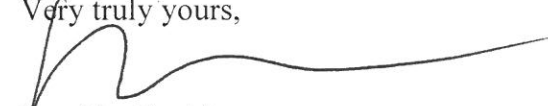
- 1. South Bronx Legionnaires' Disease Outbreak;**
- 2. East Bronx Legionnaires' Disease Outbreak;**
- 3. Morris Park Legionnaires' Disease Outbreak;**
- 4. Opera House Hotel, at 436 East 149th Street, Bronx, New York 100455;**
- 5. Citywide cooling towers investigation;**
- 6. Legionella DNA fingerprinting and results, pulse field gel electrophoresis (PFGE) testing, sequenced based typing (SBT), and whole genome sequencing (WGs) of environmental samples and human isolates;**
- 7. Any patient reporting of Legionnaires' Disease and/or related illness;**

8. Any testing performed at the New York Public Health Laboratory and New York Wadsworth Center Laboratory;

Please forward all requested records to my attention along with your invoice for the cost of reproducing the documents. We will accept records via email, facsimile, or mail. If this request is too broad or does not reasonably describe the records, please contact me via email at JENNIFER.GUOBIS@LEWISBRISBOIS.COM so that I may clarify my request, and when appropriate, indicate the manner in which records are filed, retrieved or generated. Additionally, please copy the handling attorney in this matter, Jennifer Yuen, at JENNIFER.YUEN@LEWISBRISBOIS.COM on any correspondence responsive to this request. I can also be contacted at the following telephone number: 212-232-1348 (Weekdays 9am-5pm). If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing and provide the name, address, telephone number and email address of the person or body to whom an appeal should be directed.

Please contact me should you require any additional information in order to process this request. Thank you for your cooperation and prompt attention to this matter.

Very truly yours,



Jennifer Guobis
Paralegal

LEWIS BRISBOIS BISGAARD & SMITH LLP

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